



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

October 12, 2022

NOTICE OF POTENTIAL LIABILITY
DEMAND FOR PAYMENT
URGENT LEGAL MATTER, PROMPT REPLY NECESSARY
CERTIFIED MAIL RECEIPT #7020 0640 0000 9757 4410

The B. F. Goodrich Company
Goodrich Corporation
4 Coliseum Centre
2730 West Tyvola Road
Charlotte, North Carolina 28217

Re: Demand for Payment
Goodrich Asbestos Superfund Site
Miami, Ottawa County, Oklahoma, SSID # A6MK

Dear Sir/Madam:

The United States Environmental Protection Agency ("EPA") previously contacted The B. F. Goodrich Company regarding response activities connected with the Goodrich Asbestos Site ("the Site") located in Miami, Ottawa County, Oklahoma. A copy of the EPA's General Notice Letter is in Enclosure 1 for your reference. In our letter dated July 31, 2020, the EPA informed The B. F. Goodrich Company that it may be liable for money expended by the EPA for response actions conducted at the Site under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA", commonly known as the federal "Superfund" law). In addition, the EPA provided B.F. Goodrich with an opportunity to communicate and document its financial concerns if it believed it was unable to pay the amount necessary to settle with the EPA.

Explanation of Potential Liability

Under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), potentially responsible parties ("PRPs") may be held liable for all costs incurred by the EPA, including interest, in responding to any release or threatened release of hazardous substances at the Site. PRPs include current and former owners and operators of the Site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the Site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

Based on the information collected, the EPA has determined that you may be liable under Section 107(a) of CERCLA with respect to the Site as a former owner of the Site. Enclosure 2 is a copy of the document on B.F. Goodrich's involvement with the Site.

Background

To date, the EPA has taken response actions at the Site under the authority of the Superfund Program. Below is a brief description of the actions taken at the Site:

- The former B. F. Goodrich Company operated a tire manufacturing facility at 1000 Goodrich Boulevard, in Miami, Ottawa County, Oklahoma, from 1944 until approximately 1986.
- In June 2019, at the request of the Oklahoma Department of Environmental Quality, the EPA commenced removal activities to clean up asbestos contamination at the Site, which resulted in the removal of more than 24,000 tons of asbestos-containing materials, and other hazardous substances, from the Site.

Demand for Payment

In accordance with Section 104 of CERCLA, 42 U.S.C. § 9604, the EPA has already taken certain response actions, which are listed above, and incurred certain costs in response to conditions at the Site. The EPA is seeking to recover from PRPs the response costs and all the interest expended at the Site and authorized to be recovered under Section 107(a) of CERCLA. The total response costs identified through August 31, 2022, for the Site are \$8,632,862.73. Under Section 107(a) of CERCLA, the EPA hereby makes a demand for payment from you and other PRPs for the above amount plus all interest authorized to be recovered under Section 107(a) of CERCLA. A summary of these costs reported through August 31, 2022 is enclosed as Enclosure 3.

The EPA would like to encourage communication between you, other PRPs and the EPA regarding the Site and this demand for payment. To assist you in your efforts to communicate, please find in Enclosure 4 a list of names and addresses of PRPs to whom this letter has been sent.

Ability to Pay Settlement

While this letter asks that B. F. Goodrich reimburse the EPA for all funds spent at the Site, the EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. If you believe, and can document, that you fall within this category, please contact Mr. Eppler by phone at 214-665-6529 or via email at eppler.david@epa.gov for information on ability to pay settlements. In response, you will receive a package of information about such settlements and a form to fill out with information about your finances, and you will be asked to submit financial

records including federal tax returns. If the EPA concludes that B.F. Goodrich has an inability to pay the full amount demanded, the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Some or all of the costs associated with this notice may be covered by current or past insurance policies issued to B.F. Goodrich. Most insurance policies will require that you timely notify your carrier(s) of a claim against you. To evaluate whether you should notify your insurance carrier(s) of this demand, you may wish to review current and past policies, beginning with the date of B. F. Goodrich's first contact with the Goodrich Asbestos Site. Coverage depends on many factors, such as the language of the particular policy and state law.

Also, please note that, because the EPA has a potential claim against you, you must include the EPA as a creditor if you file for bankruptcy. The EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

Resources and Information for Small Businesses

In January of 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law at <http://www.gpo.gov/fdsys/pkg/PLAW-107publ118/pdf/PLAW-107publ118.pdf> and review the EPA guidance regarding these exemptions at <http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund/>

The EPA has also created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at <http://www.epa.gov/compliance/compliance-assistance-centers>. In addition, the EPA Small Business Ombudsman may be contacted at <http://www.epa.gov/resources-small-businesses/forms/contact-us-about-resources-small-businesses>. Finally, the EPA has developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act ("SBREFA") and information on resources for small businesses, which is included with Enclosure 5 with this letter and available on the Agency's website at <http://www.epa.gov/compliance/small-business-resources-information-sheet>.

Your Response

Please send a written response to this cost recovery demand, within thirty (30) days of receipt of this letter, to:

Mr. David Eppler (SEDAE)
Enforcement Officer
Superfund and Emergency Management Division, Cost Recovery Section
U.S. EPA, Region 6
1201 Elm St, Suite 500
Dallas, Texas 75270
Telephone: (214) 665-6529
Email: eppler.david@epa.gov

If a response from you is not received within thirty (30) days, the EPA will assume that you have declined to reimburse the Superfund for the Site response costs, and the EPA will evaluate its enforcement options pursuant to CERCLA accordingly.

If you have questions regarding the response actions taken at the Site, please contact Mr. David Eppler at 214-665-6529. If you or your attorney have legal questions, please direct them to Mr. Matthew Miller, Superfund Attorney, at 214-665-6406 or miller.matthew@epa.gov.

Thank you for your prompt attention to this matter.

Sincerely yours,

JOHN MEYER

Digitally signed by JOHN
MEYER
Date: 2022.10.12 14:32:42
-05'00'

John Meyer
Acting Director
Superfund and Emergency Management Division

Enclosures:

- 1 July 31, 2020 General Notice Letter
- 2 Evidence of BF Goodrich Liability
- 3 EPA Costs
- 4 List of Potentially Responsible Parties
- 5 Small Business Resource Information Sheet

**GOODRICH ASBESTOS SUPERFUND SITE
DEMAND FOR PAYMENT**

ENCLOSURE 1

GENERAL NOTICE LETTER AND INFORMATION REQUEST



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500

DALLAS, TEXAS 75270

July 31, 2020

GENERAL NOTICE LETTER

URGENT LEGAL MATTER, PROMPT REPLY NECESSARY

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

The B.F. Goodrich Company
Goodrich Corporation
4 Coliseum Centre
2730 West Tyvola Road
Charlotte, North Carolina 28217

Re: General Notice Letter for the Goodrich Asbestos Site in Miami, Ottawa County, Oklahoma

Dear Sir/Madam,

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment – that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. The EPA has documented that such a release has occurred at the Goodrich Asbestos Site (Site) located in Miami, Ottawa County, Oklahoma. The EPA has spent public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site. Based on information presently available to the EPA, the EPA has determined that The B.F. Goodrich Company may be responsible under CERCLA for costs the EPA has incurred in cleaning up the Site.

Site Background

The former B.F. Goodrich plant operated a tire manufacturing facility at 1000 Goodrich Boulevard, Miami, Oklahoma from 1944 until approximately 1986. The former manufacturing facility occupied approximately 164 acres. Multiple structures and other areas on the Goodrich Asbestos Site were found to contain known asbestos contamination. Levels of asbestos, including friable asbestos, were found in demolition debris piles, and several abandoned structures on the Site, including the Powerhouse Building, oven building and brick office building. Asbestos contamination was also present in soils, autoclave basements, utility pits and in miscellaneous wastes at the Site. The assessment of the Site showed levels of asbestos, ranging from trace to 80% and in friable and non-friable form.

The EPA, in consultation with the Oklahoma Department of Environmental Quality, determined that trespassers were repeatedly breaking the fencing surrounding the Site, then breaking into several of the abandoned structures on the Site. The area surrounding the Site includes three schools located on the eastern perimeter of the Site as well as hundreds of homes surrounding the plant.

In May 2019, the Region 6 Superfund and Emergency Management Division provided verbal approval for an Emergency Removal Action at the Site. The EPA commenced removal activities in June 2019. In January 2020, the EPA completed the cleanup of the Site. The removal action involved the removal of more than 24,000 tons of asbestos-containing materials and other hazardous substances.

Explanation of Potential Liability

Under CERCLA specifically Sections 106(a) and 107(a), Potentially Responsible Parties (PRPs) may be required to perform cleanup actions to protect public health, welfare, or the environment. PRPs may also be responsible for costs incurred by the EPA in cleaning up the Site, unless the PRP can show divisibility or any of the other statutory defenses. PRPs include current and former owners and operators of a site as well as persons who arranged for treatment and/or disposal of any hazardous substance found at a site, and persons who accepted hazardous substances for transport and selected a site to which hazardous substances were delivered.

The former B.F. Goodrich plant operated a tire manufacturing facility at the location of the Site on 1000 Goodrich Boulevard, Miami, Oklahoma from 1944 until approximately 1986. Based on the information collected, the EPA believes that B.F. Goodrich may be liable under Section 107(a) of CERCLA with respect to the Goodrich Asbestos Site, as a current or previous owner and/or operator of the Site.

The EPA's response costs at the Site may include, but are not limited to, expenditures for conducting a Removal Action, and other investigation, planning, response oversight, and enforcement activities. In addition, PRPs may be required to pay for damages for injury to, destruction of or loss of natural resources, including the cost of assessing such damages.

Financial Concerns/Ability to Pay Settlements

The EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. If you believe, and can document, that you fall within that category, please complete the information on the enclosed "Financial Statement for Businesses" form (Enclosure 2) and mail within 14 calendar days of receipt of this letter to:

Anna Copeland, Enforcement Officer
Superfund Enforcement and Cost Recovery Section (SEDAE)
United States Environmental Protection Agency, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

Also, please note that, because the EPA has a potential claim against you, you must include the EPA as a creditor if you file for bankruptcy. The EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

If the EPA concludes that you have a legitimate inability to pay the full amount of the EPA's costs, the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Resources and Information for Small Businesses

As you may be aware, on January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law via the Internet at:

<http://www.gpo.gov/fdsys/pkg/PLAW-107publ118/pdf/PLAW-107publ118.pdf>

and review the EPA guidances regarding these exemptions at:

<https://www.epa.gov/brownfields/summary-small-business-liability-relief-and-brownfields-revitalization-act>

The EPA has created a number of helpful resources for small businesses. The EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers, which offer various forms of resources to small businesses. You may inquire about these resources at:

<https://www.epa.gov/compliance/compliance-assistance-centers>

In addition, the EPA Small Business Ombudsman may be contacted at:

<https://www.epa.gov/resources-small-businesses/asbestos-small-business-ombudsman>

Finally, the EPA developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act (SBREFA), which is enclosed with this letter and available on the Agency's website at:

<http://www.epa.gov/compliance/small-business-resources-information-sheet>

Please give these matters your immediate attention and consider consulting with an attorney. If you or your attorney have any legal questions, please contact Gloria Moran, Assistant Regional Counsel at (214) 665-3193. If you have any other questions regarding this letter, please contact Anna Copeland, Enforcement Officer at 214-665-8144. Thank you for your prompt attention to this matter.

Sincerely yours,

Johnson, Lydia

Digitally signed by Johnson, Lydia
DN: cn=Johnson, Lydia,
email=johnsonlydia@epa.gov
Date: 2020.07.31 14:22:50 -05'00'

for
Susan D. Webster, Chief
Assessment & Enforcement Branch
Superfund Division

Enclosures:

1. Evidence of Liability
2. Financial Statement for Businesses
3. Small Business Resources Fact Sheet
4. Parties Receiving General Notice Letter

ENCLOSURE 1

**GOODRICH ASBESTOS SITE
GENERAL NOTICE LETTER**

EVIDENCE OF LIABILITY

#2862

Form No. 3

BOOK 355 PAGE 780 QUIT CLAIM DEED

THIS INDENTURE, made and entered into this 12th day of August, 1975,
by and between Joseph E. Mountford and Norma Mountford, husband and wife,
parties of the first part, and
The B. F. Goodrich Company, a corporation, party of the second part;
WITNESSETH, That the said parties of the first part, for and in consideration of the sum of One Dollar
and other good and valuable considerations, ~~XXXXXX~~
to them duly paid, the receipt whereof is hereby acknowledged, do hereby quit claim, grant, bargain, sell
and convey unto the said party of the second part, and to its successors ~~XXXXXX~~ and assigns,
forever, all their right, title, interest and estate, both at law and in equity, of, in and to all of the following
described real estate situated in the County of Ottawa, and State of Oklahoma, to-wit;

DocNumber:

Book & Page:
355 780

Filed:

08-28-1975

00:00:00 AM


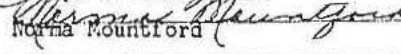
Dated:

The NE 1/4 of the SW 1/4, Section 24, T 28 N, R 22 E.

(The total consideration herein is less than \$100.00, and no documentary stamps are required under the law.)

TO HAVE AND TO HOLD THE SAME, Together with all and singular the hereditaments and appurtenances thereunto
belonging, or in anywise appertaining unto the said party of the second part, its successors ~~XXXXXX~~
and assigns, so that neither the said parties of the first part nor any person in their name or be-
half, shall or will hereafter claim or demand any right or title to the said premises or any part thereof; but they, and every
one of them, shall by these presents be excluded and forever barred.

IN WITNESS WHEREOF, The said parties of the first part have hereunto set their hands
and seals the day and year first above written.

 (Seal)
Joseph E. Mountford
 (Seal)
Norma Mountford
(Seal)
(Seal)

ACKNOWLEDGMENT

STATE OF OKLAHOMA,
County of Ottawa.

Before me the undersigned

, a Notary Public in and for said County and State on this

12th day of August, 1975, personally appeared

Joseph E. Mountford and Norma Mountford, husband and wife,
to me know to be the identical persons who executed the within and foregoing
instrument and acknowledged to me that they executed the same as their
free and voluntary act and deed for the uses and purposes therein set forth.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official
seal the day and year last above written.

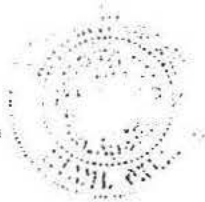
My commission expires

October 31,

1976.


Notary Public.

\$ 2.00



2302 S. Darnell
Dulles, OK. 74129

4280

BOOK 556 PAGE 695

QUIT-CLAIM DEED

THIS INDENTURE, made this 16th day of September, 1993,
between The B.F. Goodrich Company, a corporation under the laws of the State of New
York, party of the first part, and Save Our Children's Environment, a corporation under
the laws of the State of Oklahoma, party of the second part.

WITNESSETH, that said party of the first part, in consideration of the sum of
ONE & NO/100THS (\$1.00) DOLLARS to it duly paid, the receipt whereof is hereby
acknowledged, does hereby quit-claim, grant, bargain, sell and convey unto the said party
of the second part, and to it's successors and assigns forever, all it's right, title interest
and estate, both at law and in equity, of, in and to, the following described real estate,
situated in the County of OTTAWA, State of Oklahoma, to-wit:

The South Half of the Northwest Quarter and the North Half of the Southwest
Quarter of Section Twenty-four, Township Twenty-eight North, Range Twenty-two
East of the Indian Meridian.

(THE CONSIDERATION FOR THIS DEED IS LESS THAN \$100.00)

Together with all and singular the hereditaments and appurtenances thereunto
belonging. TO HAVE AND TO HOLD the above granted premises unto the said party
of the second part it's successors and assigns forever.

IN WITNESS WHEREOF, The Vice President of The B.F. Goodrich Company
has caused this Quit-Claim Deed to be executed in it's name on it's behalf and the seal
of said Corporation to be hereunto affixed and attested by it's Assistant Secretary, all as
of the day and year first above written.

THE B.F. GOODRICH COMPANY

By R. A. McMillan KOB
R. A. McMillan, Vice President
RECORDED IN THE OFFICE OF
COUNTY CLERK
OTTAWA COUNTY, OKLAHOMA

SEP 16 11 03 AM '93

CLERK
Deputy
BY DEPUTY

ATTEST:

R. N. Jacobson
R. N. Jacobson, Assistant Secretary

STATE OF OHIO

COUNTY OF PORTAGE ss.

The above and foregoing instrument was subscribed and sworn to before me on the
16th day of SEPTEMBER, 1993, by R. A. McMillan, Vice President of The
B.F. Goodrich Company, a corporation under the laws of the State of New York, for and
on behalf of said corporation.

Given under my hand and seal of office the day and year above written.

Joanne Prosser
NOTARY PUBLIC

My Commission Expires:

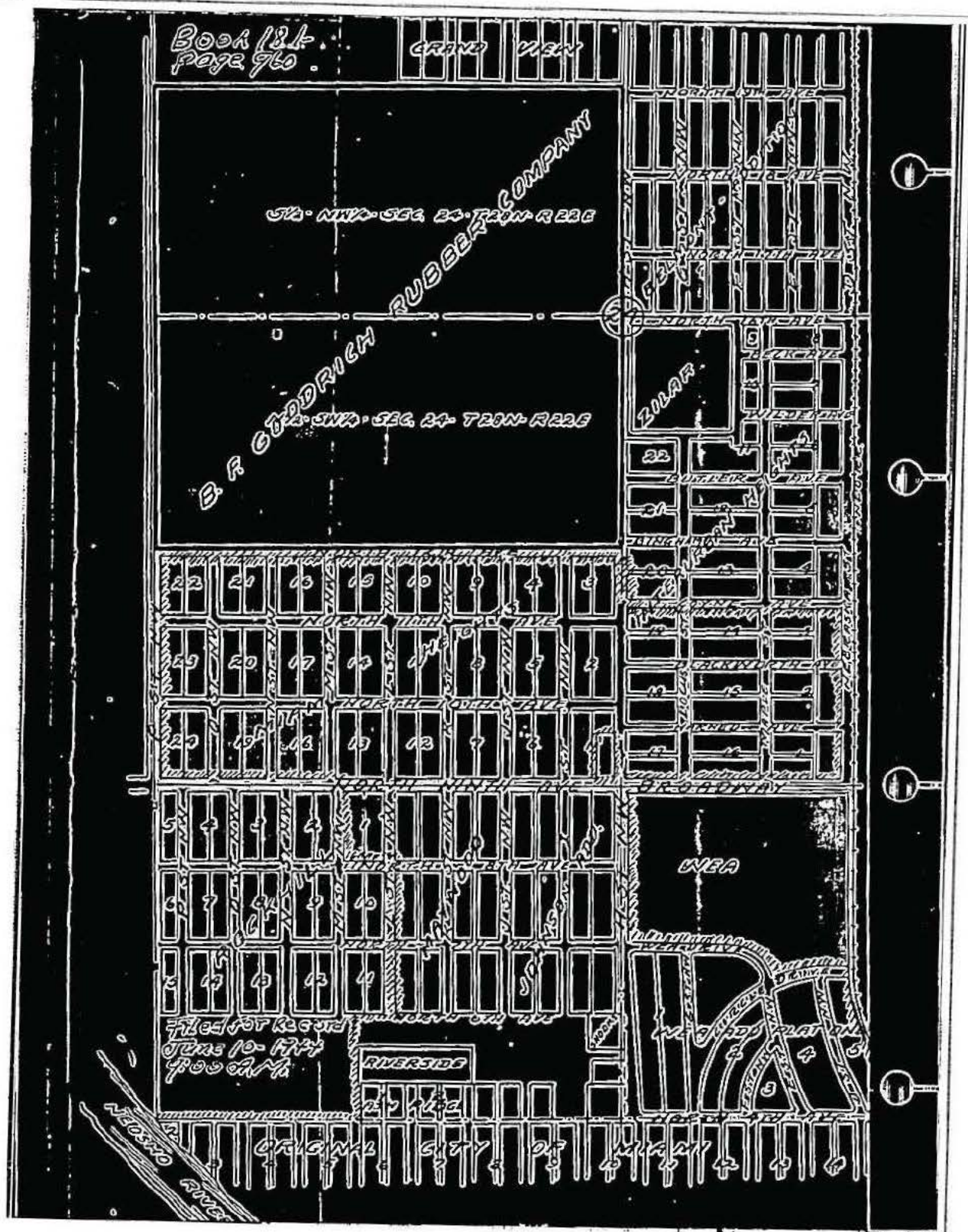
Joanne Prosser
Notary Public for State of Ohio
My commission expires June 20, 1998

Ottawa County Abstract & Title

DocNumber:

Book & Page:
181 959

Filed:
06-10-1944
00:00:00 AM
Dated:



ENCLOSURE 2

**GOODRICH ASBESTOS SITE
GENERAL NOTICE LETTER**

FINANCIAL STATEMENT FOR BUSINESSES



U.S. Environmental Protection Agency, Region IX
Financial Statement for Businesses *

(If additional space is needed, attach a separate sheet)

1. Your name and address (including zipcode and county)		1a. Business name and address (including zipcode and county)		2. Business phone number ()
3. Name and address of registered agent (including zipcode and county)		4. (Check appropriate box)		
		<input type="checkbox"/> Sole proprietor <input type="checkbox"/> Trust <input type="checkbox"/> Partnership <input type="checkbox"/> Other (specify) _____ <input type="checkbox"/> Corporation		
5. State of Incorporation (or country if foreign)	5a. Employer Identification Number	6. Date of Incorporation		7a. Type of business
				7b. SIC Code

8. Information about owner, partners, officers, directors, major shareholder (5% or more stock ownership), other holders of more than 5% equity interest, holders of rights to purchase more than equity interest and other persons with an ability to control.

Name and Title	Effective Date	Home Address	Social Security Number (optional)	Phone Number	Total Shares or Interest

Section I General Financial Information

9. Last three years Federal and state income tax returns	Forms Filed	Tax Years ended	Net income before taxes
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10. Bank accounts (List all types of accounts including checking, savings, certificates of deposit, etc.)

Name of Institution	Address	Type of Account	Account No.	Balance
Total (Enter in Item 19)				

11. Bank Credit available (Lines of credit, etc.)

Name of Institution	Address	Credit Limit	Amount Owed	Credit Available	Monthly
Totals					

12. Location, box number, and contents of all safe deposit boxes rented or accessed


Section I - continued

General Financial Information

13. Real property

Brief Description and Type of Ownership	Address (include county, state and parcel number)
a.	
b.	
c.	

14. Insurance policies owned with business as beneficiary

Name Insured	Company	Policy Number	Type	Face Amount	Available Loan Value
Total (Enter in Item 21)					

15. Additional Information (Court and administrative proceedings by or against the business, settlement agreements, agreements to purchase or sell tangible or financial assets other than in the ordinary course of business, legal claims (whether asserted or not), bankruptcies, repossessions, recent transfers of assets for less than full value, anticipated increases in income, options to buy or sell real or personal property, real or personal property being purchased under contract, real or personal property being held on behalf of the business).


15a. List all subsidiaries owned, joint ventures, partnerships and other entities controlled by the business. Provide current market value of the business' interest in such subsidiary or other entity.

16. Federal government departments or agencies with whom you have a contract for payment of goods or services

Agency Name	Address	Contract No.	Amount to be Received	Payment Due Date

16a. Federal government departments or agencies that have extended or given the business loans, grants or assistance, or to which you have applied (or anticipate applying for any loan, grant, or assistance) in the past 5 years.

17. Accounts/Notes receivable (include loans to stockholders, officers, partners, etc.)

Agency Name	Address	Amount Due	Due Date	Status
Total (Enter in Item 20)				

Section II.

Asset and Liability Analysis

Description (a)	Cur. Mkt Value (b)	Liabilities Bal. Due (c)	Equity in Asset (d)	Amount of Mo. Pymt. (e)	Name and Address of Lien/Note Holder/Obligee (f)	Date Pledged (g)	Date of Final Pymt. (h)
18. Cash on hand							
19. Bank accounts							
19a. Securities and other financial assets owned							
20. Accounts/Notes receivable							
21. Insurance Loan Value							
22. Real property (from item 13)	a.						
	b.						
	c.						
	d.						
23. Vehicles (Model, year, license)	a.						
	b.						
	c.						
24. Machinery and equipment (Specify)	a.						
	b.						
	c.						
25. Merchandise inventory (Specify)	a.						
	b.						
26. Other Assets (including permits, licenses, tax loss carry forwards, agreements not to compete, other contracts) (Specify)	a.						
	b.						
	c.						
	d.						
27. Other Liabilities (Include judgements, notes, tax liens, etc.)	a.						
	b.						
	c.						
	d.						
	e.						
28. Federal & State Taxes Owed							
29. Totals							

Section III.

Income and Expense Analysis

The following information applies to income and expenses during a one year period:

Accounting method used

to

Income

Expenses

30. Gross receipts from sales, services, etc.

\$

36. Materials purchased

\$

31. Gross rental income

37. Wages and salaries of employees

32. Interest

38. Wages/salaries/bonuses for officers, directors and stockholders

33. Dividends

39. Rent

34. Other income (Specify)

40. Installment payments (from line 29)

41. Supplies

42. Utilities / Telephone

43. Gasoline / Oil

44. Repairs and maintenance

45. Insurance

46. Current taxes

47. Other, including fees paid for services (Specify)

35. Total



\$

48. Total



\$

49. Net difference



\$

50. List all transferred real & personal property, including cash (by gift; by loan that was not at fair market terms; by sale for less than fair market value or made outside the normal course of business, etc.) that was made within the last 3 years (items of \$3,000.00 or more):

Date	Amount	Property Transferred	To Whom	Conditions of Transfer
			(Indicate any relationship to business or its partners, directors, stockholders, or other controlling persons)	

Certification

Under penalties of perjury, I declare that to the best of my knowledge and belief this statement of assets, liabilities, and other information is true, correct, and complete.

51. Signature

52. Print Name / Title

53. Date

ENCLOSURE 3

**GOODRICH ASBESTOS SITE
GENERAL NOTICE LETTER**

SMALL BUSINESS RESOURCES FACT SHEET

U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Office of Small and Disadvantaged Business Utilization (OSDBU)

<https://www.epa.gov/aboutepa/about-office-small-and-disadvantaged-business-utilization-osdbu>

EPA's OSDBU advocates and advances business, regulatory, and environmental compliance concerns of small and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman (ASBO)

<https://www.epa.gov/resources-small-businesses/asbestos-small-business-ombudsman> or 1-800-368-5888

The EPA ASBO serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

Small Business Environmental Assistance Program

<https://nationalsbeap.org>

This program provides a "one-stop shop" for small businesses and assistance providers seeking information on a wide range of environmental topics and state-specific environmental compliance assistance resources.

EPA's Compliance Assistance Homepage

<https://www.epa.gov/compliance>

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

Compliance Assistance Centers

<https://www.complianceassistance.net>

EPA-sponsored Compliance Assistance Centers provide the information you need, in a way that helps make sense of environmental regulations. Each Center addresses real world issues faced by a specific industry or government sector. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture

<https://www.epa.gov/agriculture>

Automotive Recycling

<http://www.ecarcenter.org>

Automotive Service and Repair

<https://ecar-greenlink.org/> or 1-888-GRN-LINK

Combustion—Boilers, Generators, Incinerators, Wood Heaters

<https://www.combustionportal.org/>

Construction

<http://www.cicacenter.org>

Education

<https://www.nacubo.org/>

Healthcare

<http://www.herecenter.org>

Local Government

<https://www.lgean.net/>

Oil/ Natural Gas Energy Extraction

<https://www.eeiee.org/>

Paints and Coatings

<https://www.paintcenter.org/>

Ports

<https://www.portcompliance.org/>

Surface Finishing

<http://www.sterc.org/>

Transportation

<https://www.terecenter.org/>

U.S. Border Compliance and Import/Export Issues

<https://www.bordercenter.org>

Veterinary Care

<https://www.vetca.org/>

EPA Hotlines and Clearinghouses

www.epa.gov/home/epa-hotlines

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Examples include:

Clean Air Technology Center (CATC) Info-line

www.epa.gov/cate or 1-919-541-0800

Superfund, TRI, EPCRA, RMP, and Oil Information Center

1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline

www.epa.gov/otaq/imports or 1-734-214-4100

National Pesticide Information Center

www.npic.orst.edu or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills - <http://nrc.uscg.mil> or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) -

www.epa.gov/p2/pollution-prevention-resources/ppic or 1-202-566-0799

Safe Drinking Water Hotline -

www.epa.gov/ground-water-and-drinking-water/safe-drinking-water-hotline or 1-800-426-4791

Toxic Substances Control Act (TSCA) Hotline

tsc hotline@epa.gov or 1-202-554-1404

U.S. Small Business Resources

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<https://www.epa.gov/reg-flex/small-entity-compliance-guides>

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- **EPA's Audit Policy**
www.epa.gov/compliance/epas-audit-policy

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Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.

ENCLOSURE 4

**GOODRICH ASBESTOS SITE
GENERAL NOTICE LETTER**

PARTIES RECEIVING GENERAL NOTICE LETTER

Real Estate Remediation LLC
3519 Greensboro Avenue
Tuscaloosa, Alabama 35401

Allan Kaspar

(b) (6)

A large black rectangular redaction box covers the majority of the contact information for Allan Kaspar, leaving only the redaction code (b) (6) visible.

The B.F. Goodrich Company
Goodrich Corporation
4 Coliseum Centre
2730 West Tyvola Road
Charlotte, North Carolina 28217

Michelin North America, Inc.
One Parkway South
P.O. Box 19001
Greenville, South Carolina 29602

**GOODRICH ASBESTOS SUPERFUND SITE
DEMAND FOR PAYMENT**

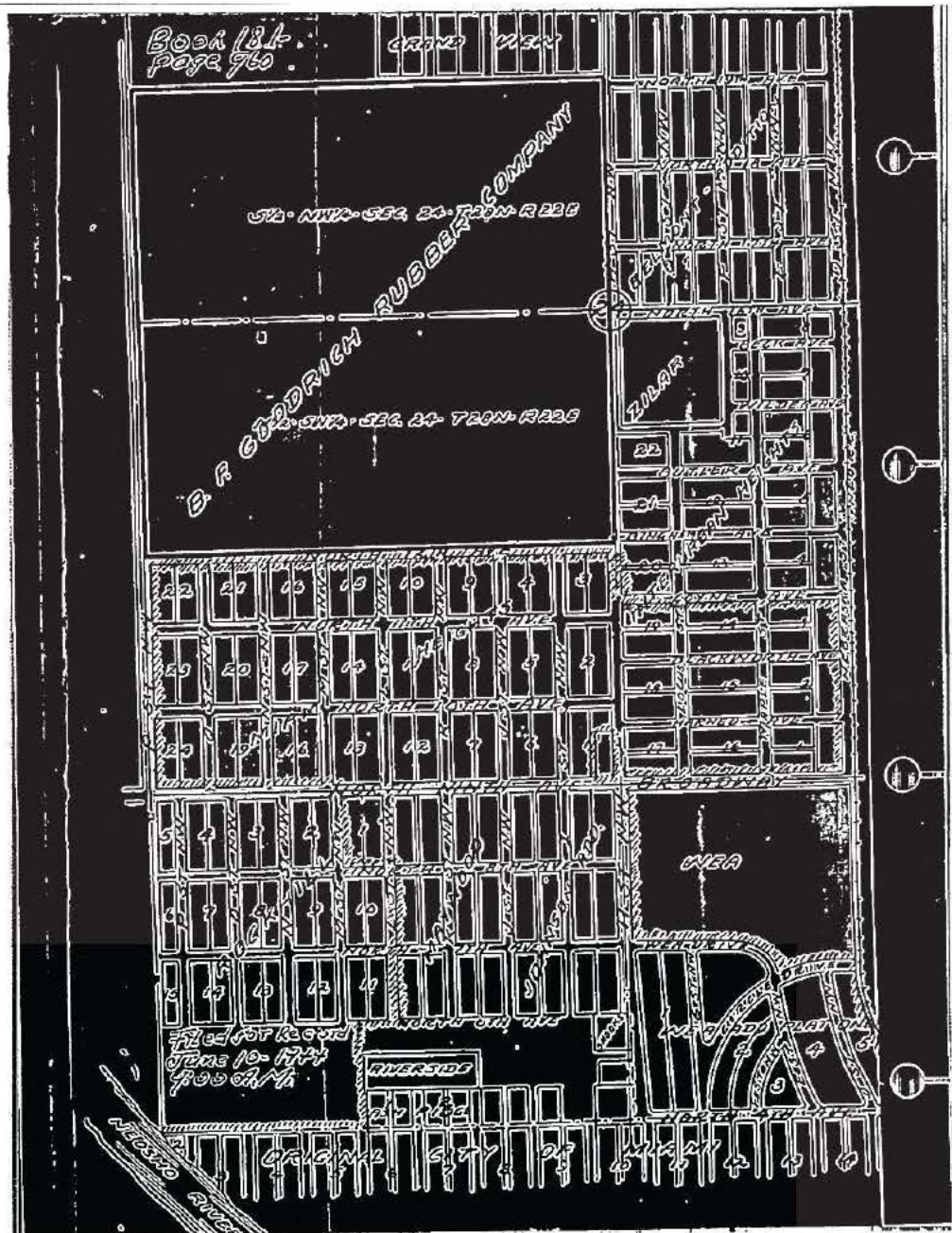
ENCLOSURE 2

EVIDENCE OF B. F. GOODRICH LIABILITY

DocNumber:

Book & Page:
181 959

Filed:
06-10-1944
00:00:00 AM
Dated:



#2862

Form No. 3

BOOK 355 PAGE 780 QUIT CLAIM DEED

THIS INDENTURE, made and entered into this 12th day of August, 1975,
by and between Joseph E. Mountford and Norma Mountford, husband and wife,
The B. F. Goodrich Company, a corporation,
WITNESSETH, That the said parties of the first part, for and in consideration of the sum of One Dollar
and other good and valuable considerations,
to them duly paid, the receipt whereof is hereby acknowledged, do hereby quit claim, grant, bargain, sell
and convey unto the said party of the second part, and to its successors and assigns,
forever, all their right, title, interest and estate, both at law and in equity, of, in and to all of the following
described real estate situated in the County of Ottawa, and State of Oklahoma, to-wit:

DocNumber:

Book & Page:
355 780

Filed:
08-28-1975
00:00:00 AM
Dated:

The NE 1/4 of the SW 1/4, Section 24, T 28 N, R 22 E.

RECORDED
75-27 49:49
[Signature]

(The total consideration herein is less than \$100.00, and no documentary stamps are required under the law.)

TO HAVE AND TO HOLD THE SAME, Together with all and singular the hereditaments and appurtenances thereunto
belonging, or in anywise appertaining unto the said party of the second part, its successors and
assigns, so that neither the said parties of the first part nor any person in their name or be-
half, shall or will hereafter claim or demand any right or title to the said premises or any part thereof; but they, and every
one of them, shall by these presents be excluded and forever barred.

IN WITNESS WHEREOF, The said parties of the first part have hereunto set their hands
and seals the day and year first above written.
[Signature] (Seal)
Joseph E. Mountford
[Signature] (Seal)
Norma Mountford

(Seal)

STATE OF OKLAHOMA, }
County of Ottawa. } ss.
Before me the undersigned, a Notary Public in and for said County and State on this
12th day of August, 1975, personally appeared
Joseph E. Mountford and Norma Mountford, husband and wife,
to me know to be the identical persons who executed the within and foregoing
instrument and acknowledged to me that they executed the same as their
free and voluntary act and deed for the uses and purposes therein set forth.
IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official
seal the day and year last above written.
My commission expires October 31, 1976.
[Signature] Notary Public.
\$3.00

2302 S. Barnett
Juleson, OK. 74129

4280

BOOK 556 PAGE 695

QUIT-CLAIM DEED

THIS INDENTURE, made this 16th day of September, 1993,
between The B.F. Goodrich Company, a corporation under the laws of the State of New
York, party of the first part, and Save Our Children's Environment, a corporation under
the laws of the State of Oklahoma, party of the second part.

WITNESSETH, that said party of the first part, in consideration of the sum of
ONE & NO/100THS (\$1.00) DOLLARS to it duly paid, the receipt whereof is hereby
acknowledged, does hereby quit-claim, grant, bargain, sell and convey unto the said party
of the second part, and to it's successors and assigns forever, all it's right, title interest
and estate, both at law and in equity, of, in and to, the following described real estate,
situated in the County of OTTAWA, State of Oklahoma, to-wit:

The South Half of the Northwest Quarter and the North Half of the Southwest
Quarter of Section Twenty-four, Township Twenty-eight North, Range Twenty-two
East of the Indian Meridian.

(THE CONSIDERATION FOR THIS DEED IS LESS THAN \$100.00)

Together with all and singular the hereditaments and appurtenances thereunto
belonging. TO HAVE AND TO HOLD the above granted premises unto the said party
of the second part it's successors and assigns forever.

IN WITNESS WHEREOF, The Vice President of The B.F. Goodrich Company
has caused this Quit-Claim Deed to be executed in it's name on it's behalf and the seal
of said Corporation to be hereunto affixed and attested by it's Assistant Secretary, all as
of the day and year first above written.

THE B.F. GOODRICH COMPANY

By R. A. McMillan *RAM*
R. A. McMillan, Vice President
RECORDED IN THE OFFICE OF
COUNTY CLERK
OTTAWA COUNTY, OKLA.
SEP 16 11 03 AM '93

ATTEST:

R. N. Jacobson
R. N. Jacobson, Assistant Secretary

STATE OF OHIO
COUNTY OF PORTAGE ss.

Joanne Prosser
NOTARY PUBLIC

The above and foregoing instrument was subscribed and sworn to before me on the
16th day of September, 1993, by R. A. McMillan, Vice President of The
B.F. Goodrich Company, a corporation under the laws of the State of New York, for and
on behalf of said corporation.

Given under my hand and seal of office the day and year above written.

Joanne Prosser
NOTARY PUBLIC

My Commission Expires:

Joanne Prosser
Notary Public for State of Ohio
My commission expires June 20, 1998

Ottawa County Abstract & Title

TYPE OF DEED: WARRANTY DEED
TITLE IS VESTED IN: THE B. F. GOODRICH COMPANY
TITLE RECEIVED FROM: BECK MINING AND ROYALTY COMPANY
DATE EXECUTED: 02/26/1944
DATE RECORDED: 02/26/1944
BOOK: 180
PAGE: 145
VOLUME: NA
INSTRUMENT #: NA
DOCKET: NA
LAND RECORD COMMENTS: ORDINANCE NO. 678 RECORDED 06/05/1944, DOC#181/59 BOUNDARIES OF THE
CITY OF MIAMI.
PLAT MAP RECORDED 06/10/1944, DOC#181/959.
WELL NO. 4 AND PUMPHOUSE LOCATED ON SAID PROPERTY – RECORDED
06/27/1944, DOC# 182/197

**GOODRICH ASBESTOS SUPERFUND SITE
DEMAND FOR PAYMENT**

ENCLOSURE 3

EPA COSTS

Reconciliation Pending

Itemized Cost Summary

GOODRICH ASBESTOS, MIAMI, OK SITE ID = A6 MK

UNRECONCILED COST FROM INCEPTION THROUGH 8/31/2022
LITIGATION/SETTLEMENT

REGIONAL PAYROLL COSTS	\$293,387.95
REGIONAL TRAVEL COSTS	\$63,156.19
COMMERCIAL ITEMS OR BUYS	
RRGP SERVICES INC (EPS61102)	\$91.62
EMERGENCY RESPONSE CONTRACTS-SUB (ERC)	
ENVIRONMENTAL RESTORATION, LLC (EPS41604)	\$4,345,446.42
ENFORCEMENT SUPPORT SERVICES (ESS)	
ARS ALEUT REMEDIATION, LLC (EPS51701)	\$28,563.44
SUPERFUND TECH ASSIST AND RESPONSE TEAM (START3)	
WESTON SOLUTIONS, INC. (EPW06042)	\$11,742.38
TECHNICAL SERVICES AND SUPPORT	
WESTON SOLUTIONS, INC. (EPS51702)	\$942,326.86
MISCELLANEOUS COSTS (MIS)	(\$2,869.23)
EPA INDIRECT COSTS	\$2,951,017.10
Total Site Costs:	\$8,632,862.73

**GOODRICH ASBESTOS SUPERFUND SITE
DEMAND FOR PAYMENT**

ENCLOSURE 4

**POTENTIALLY RESPONSIBLE PARTIES
LEGAL CONTACTS**

Heidi B. (Goldstein) Friedman
Counsel for B. F. Goodrich
Thompson Hine LLP
Attorneys at Law
3900 Kay Center
127 Public Square
Cleveland, Ohio 44114-1291
www.ThompsonHine.com
T: 216-566-5500
F: 216-566-5800

Connie M. Bryan
Counsel for Michelin North America
McCormick & Bryan, PLLC
Attorneys at Law
2011 W. Danforth Rd., #135
Edmond, Oklahoma 73003
T: 405-562-6800
F: 405-643-7015
mccormickbryan.com

Jot Harley
Counsel for Alan Kaspar
The Hartley Law Firm, PLLC
177 W. Delaware
P. O. Box 553
Vinita, OK 74301
(918) 256-2100
jot@hartleylawfirm.com

Mr. George Blakeney
Real Estate Remediation LLC
2417 Fredericksburg Drive
Tuscaloosa, Alabama 35406
(205) 454-3900
georgeblakeney@gmail.com

**GOODRICH ASBESTOS SUPERFUND SITE
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ENCLOSURE 5

SMALL BUSINESS RESOURCES INFORMATION SHEET

U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Office of Small and Disadvantaged Business Utilization (OSDBU)

<https://www.epa.gov/aboutepa/about-office-small-and-disadvantaged-business-utilization-osdbu>

EPA's OSDBU advocates and advances business, regulatory, and environmental compliance concerns of small and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman (ASBO)

<https://www.epa.gov/resources-small-businesses/asbestos-small-business-ombudsman> or 1-800-368-5888

The EPA ASBO serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

Small Business Environmental Assistance Program

<https://nationalsbeap.org>

This program provides a "one-stop shop" for small businesses and assistance providers seeking information on a wide range of environmental topics and state-specific environmental compliance assistance resources.

EPA's Compliance Assistance Homepage

<https://www.epa.gov/compliance>

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

Compliance Assistance Centers

<https://www.complianceassistance.net>

EPA-sponsored Compliance Assistance Centers provide the information you need, in a way that helps make sense of environmental regulations. Each Center addresses real world issues faced by a specific industry or government sector. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture

<https://www.epa.gov/agriculture>

Automotive Recycling

<http://www.ecarcenter.org>

Automotive Service and Repair

<https://ccar-greenlink.org/> or 1-888-GRN-LINK

Combustion—Boilers, Generators, Incinerators, Wood Heaters

<https://www.combustionportal.org/>

Construction

<http://www.cicacenter.org>

Education

<https://www.nacubo.org/>

Healthcare

<http://www.hercenter.org>

Local Government

<https://www.lgean.net/>

Oil/ Natural Gas Energy Extraction

<https://www.eciee.org/>

Paints and Coatings

<https://www.paintcenter.org/>

Ports

<https://www.portcompliance.org/>

Surface Finishing

<http://www.sterc.org/>

Transportation

<https://www.tercenter.org/>

U.S. Border Compliance and Import/Export Issues

<https://www.bordercenter.org/>

Veterinary Care

<https://www.vetca.org/>

EPA Hotlines and Clearinghouses

www.epa.gov/home/epa-hotlines

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Examples include:

Clean Air Technology Center (CATC) Info-line

www.epa.gov/catc or 1-919-541-0800

Superfund, TRI, EPCRA, RMP, and Oil Information Center

1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline

www.epa.gov/otaq/imports or 1-734-214-4100

National Pesticide Information Center

www.npic.orst.edu or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills - <http://nrc.uscg.mil> or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) -

www.epa.gov/p2/pollution-prevention-resources#ppic or 1-202-566-0799

Safe Drinking Water Hotline -

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7020 0640 0000 9757 4430

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee \$4.00
 \$3.25
 Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$1.92

Total Postage and Fees \$9.17

Sent to

Street and Apt. No., or PO Box

City, State, ZIP+4®

The B. F. Goodrich Company
 Goodrich Corporation
 4 Coliseum Centre
 2730 West Tyvola Road
 Charlotte, North Carolina 28217



10/14/2022